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Before the Federal Communications Commission
Washington, D.C. 20554

In the Matter of:	)	
	)	
	)	
Policy and Rules Concerning the	)	
Interstate, Interexchange Marketplace	)	CC Docket No. 96-61
Universal Service	)	
	)	
Implementation of Section 254(g) of the	)	
Communications Act of 1934, as amended	)	
	)	

Reply to Oppositions To Petition for Reconsideration

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November 10, 1997

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Summary of AirTouch Reply

Both opponents of the AirTouch Petition, Alaska and Hawaii, agree that rate integration should not be required between CMRS providers controlled by two or more corporate parents not under common control, nor between commonly-owned CMRS providers competing in the same area. And both agree that consumers should have the option of obtaining CMRS service through wide-area calling plans that include no separate or additional toll charges for calls that would be considered "interexchange" if made on the landline LEC/IXC network. Both of these issues were considered in the Commission's Stay Order. At a minimum, these unopposed issues should be addressed by a permanent stay or waiver.

However, because the oppositions to the reconsideration petitions are premised on factual assumptions inapplicable to the CMRS industry, and because competition and consumers will be harmed without further action, the Commission should establish that CMRS carriers are not subject to the rate integration rule. AirTouch maintains that legislative history, Commission precedent, and common sense demonstrate that the rate integration rule does not apply to CMRS.

The oppositions fail to provide any persuasive argument to rebut AirTouch's position that rate integration is simply unnecessary to protect consumers in Alaska, Hawaii, or elsewhere from unreasonable or unaffordable rates for CMRS services. There are three possible economic reasons why consumers would pay more for CMRS rates in insular areas: 1) the costs of service are higher; 2) competition in those areas is insufficient; 3) there is an unusually higher level of demand. None of these are true with respect to CMRS services in insular areas. First, no party discusses unusually high levels of demand; it can be assumed that, as with rural areas, it is concerns with lower demand that are involved. Second, the petitions document that sufficient competition exists and is increasing. Third, the costs of CMRS service do not vary significantly between offshore points and the mainland, including the costs of CMRS long-distance service.

Turning first to competition, no party disputes the fact that CMRS competition in all markets, including Alaska and Hawaii, is robust and growing. Rather, the oppositions are concerned with just the opposite: that increasing CMRS competition will harm consumers in Alaska and Hawaii by lowering prices closer to costs.

As AirTouch explained at length in its Petition, competition in the CMRS industry cannot harm consumers in Alaska and Hawaii by lowering prices closer to costs or in any other manner. Alaska and Hawaii mistakenly assume that, as with landline services, competition will threaten existing cross-subsidies that keep rates in insular areas low. This concern is inapplicable to CMRS because CMRS service rates do not include these implicit subsidies.

Second, the oppositions discount the arguments that CMRS competition protects consumers in Alaska and Hawaii from unjust or unreasonable rates, citing the Commission's decision that competition in the landline interexchange market is insufficient to justify forbearance from rate integration. This reference misses the point entirely. The essence of the rate integration concept is that prices in offshore areas would be "integrated" into a national schedule of charges for interstate, interexchange services. The Commission has found that the relevant geographic market for those services is nationwide. But CMRS carriers compete locally; CMRS prices have never been set through a national tariff. Therefore, competition in local CMRS markets creates fundamentally different incentives than competition in the nationwide market for landline IXC services. Given the important differences in the relevant geographic market, the Commission's decision not to forbear from rate integration based on competitive considerations in the landline IXC context is inapplicable to CMRS. There is no competitive incentive or ability for CMRS carriers to raise rates in offshore areas.

The costs of CMRS services, including long distance, do not include the disparate access charges assessed on landline IXCs, used to provide subsidies to Alaska and Hawaii. Since the costs of CMRS service do not vary in the way that they do for landline IXCs, there is no incentive for CMRS carriers to raise rates in insular areas. To the extent that CMRS carriers offer customers the ability to place calls to points outside the local CMRS calling area, they generally do so through resold services of facilities-based IXCs. Since the underlying services are already rate integrated (and rate averaged), these costs do not vary depending on whether the CMRS carrier operates in an offshore area. Thus, rate integration is unnecessary to protect consumers.

Both Alaska and Hawaii demonstrate the incongruity of applying rate integration to CMRS by equating the "interexchange" CMRS services subject to rate integration with "telephone toll service," defined as "telephone service between stations in different exchange areas for which

there is a made a separate charge not included in contracts with subscribers for exchange service." But it is not explained what the relevant "stations" or "exchange areas" are in the CMRS context.

Hawaii suggests that "CMRS calls could be classified in accordance with the classification of the underlying resold landline facility." Classifying calls in this manner would inhibit the ability of CMRS to offer wide-area calling plans and other options to consumers. Rates for calls considered by landline customer to be a toll call, but considered by a CMRS customer to be "local" within her home CMRS market would now be subject to rate integration. If the rates for these calls are to be integrated, they must be separated from the basic access and airtime charges. This harms consumers, imposes technical burdens on CMRS carriers and is contrary to the regulatory approach Congress intended for CMRS carriers.

Finally, both Alaska and Hawaii suggest some limited relief from the anti-competitive effects of applying rate integration across CMRS affiliates. Under their approach, "affiliation" would not apply to multiple competing parent companies that jointly control a CMRS provider or commonly owned providers competing in the same geographic service area. This proposal offers some limited relief, and would reduce the harm to competition. Even so, these limited exceptions are unnecessarily difficult to administer and unnecessary. Accordingly, the Commission should simply grant a permanent waiver of the affiliation rule as applied to CMRS.

Congress intended the 1996 amendments to institute a "de-regulatory" approach. Rather than attempting to shoehorn CMRS services into a rule intended only for landline services and that system of implicit universal service subsidies the Commission should simply ask and answer the question of whether applying rate integration to CMRS carriers is necessary. As nearly everyone has assumed for the existence of the rate integration policy, rate integration for CMRS carriers is simply not necessary to protect consumers and the Commission should proceed accordingly.

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Reply to Oppositions To Petition for Reconsideration

AirTouch Communications, Inc. ("AirTouch") respectfully submits its reply to the oppositions filed in response to its Petition for Reconsideration ("AirTouch Petition") of the First Memorandum Opinion and Order in the above-captioned proceedings.[1] AirTouch, along with several other parties, asked the Commission to determine that: 1) CMRS providers are not subject to the rate integration requirements of Section 254(g), or at least 2) that CMRS providers need not integrate rates across affiliates. Both the State of Alaska ("Alaska") and the State of Hawaii ("Hawaii") filed oppositions.

Both Alaska and Hawaii agree that integration should not be required between CMRS providers that are controlled by two or more corporate parents not under common control, nor between commonly-owned CMRS providers competing in the same geographic service area.[2] And both Alaska and Hawaii agree that consumers should have the option of obtaining CMRS service through wide-area calling plans that include no separate or additional toll charges for customers to

[1] In the Matter of Implementation of Section 254(g) of the Communications Act of 1934," First Memorandum Opinion and Order on Reconsideration, CC Docket No. 96-61, FCC 97-269 (released July 30, 1997)("Reconsideration Order"). This reply is filed pursuant to 47 C.F.R. § 1.429(g).

[2] See Opposition of Alaska at 14; Opposition of Hawaii at 24.

make calls that would be considered "interexchange" if made on the landline LEC/IXC network.[3] Both of these issues were considered in the Commission's Stay Order.

At a minimum, these unopposed issues should be addressed by a permanent stay or waiver. However, because the oppositions to the reconsideration petitions are premised on factual assumptions not applicable to the CMRS industry, and because competition and consumers will be harmed without further action, the Commission should provide further clarification that CMRS carriers are not subject to the rate integration rule.

AirTouch maintains that legislative history, Commission precedent, and common sense demonstrate that rate integration was never intended to apply to CMRS. The rate integration rule in Section 254(g) of the Communications Act simply codifies earlier policy applicable to interstate MTS and WATS service.[4] That position has been amply documented in the original petitions. This reply focuses on the primary reason why rate integration for CMRS was never intended: review of the facts demonstrates that rate integration is unnecessary to protect consumers.

DISCUSSION

I. Rate Integration Is Not Necessary to Protect Consumers

The most salient point in these proceedings is whether rate integration is, or was ever, necessary to ensure that consumers in offshore or insular areas are not excluded from the telecommunications "community" because of discriminatory or unaffordable CMRS rates. But the oppositions neither describe how or why a CMRS carrier would charge discriminatory or unaffordable rates in insular areas, or document any evidence that such practices are occurring. The most that is proffered in the way of argument are unsubstantiated statements that "it is abundantly clear that [offshore] consumers ... would continue to pay discriminatory CMRS rates" absent a rate integration rule.[5] But it is not abundantly clear at all.

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[3] See Opposition of Alaska at 15; Opposition of Hawaii at 25.

[4] See, e.g., 2 FCC Rcd 6479, 6481 (1987)("rate integration policy was developed to provide...interstate MTS and WATS service to and from Alaska at rates comparable to those [in the contiguous states]").

[5] Opposition of Hawaii at 10; see Opposition of Alaska at 11.

There are three possible economic reasons why consumers would pay more for CMRS rates in insular areas: 1) the costs of service are higher; 2) competition in those areas is insufficient; 3) there is an unusually higher level of demand. None of these are true with respect to CMRS services in insular areas. First, no party discusses high levels of demand; it can be assumed that, with rural and insular areas, it is concerns with lower demand that are involved. Second, no party disputes that CMRS competition exists and is increasing. Third, the costs of CMRS in offshore areas are not so different that rate integration is necessary to protect consumers.

Turning first to competition, CTIA notes in its petition that there are at least six cellular or PCS providers actively providing service in Hawaii, and at least eight in various parts of Alaska.[6] CMRS carriers in Alaska and Hawaii thus face vigorous competition; any attempt to charge unreasonable or unjust prices would be unsuccessful as customers elect to take service from other CMRS providers. Moreover, for CMRS providers, interstate long-distance service is either an inherent part of the basic end-to-end mobile telephony service, or merely an adjunct to it. Consequently, CMRS carriers have no incentive to risk losing basic service customers by charging unreasonable rates for adjunct services.[7]

Insufficient competition, moreover, is not the concern of the oppositions. Rather, the oppositions are apparently concerned with just the opposite: that CMRS competition in the continental 48 states will harm consumers in Alaska and Hawaii by lowering prices closer to costs.[8] Alaska and Hawaii mistakenly assume that, as with landline interstate, interexchange services, competition will threaten existing cross-subsidies that keep rates in rural and insular areas low, or result in discriminatory rates relative to the mainland.[9] As AirTouch explained in its petition, this concern is inapplicable to CMRS because CMRS services in the continental 48 states do not subsidize services in Alaska and Hawaii through implicit cross-subsidies in the way that

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[6] See CTIA Petition at 10, n.15.

[7] See AirTouch Petition at 9.

[8] See, e.g., Opposition of Hawaii at 10-11 (Noting that Congress included rate integration in the 1996 Act knowing that the interexchange market was competitive because competition threatens universal service by bringing rates close to cost, and making rate disparities between geographic regions worse).

[9] See, e.g., Opposition of Hawaii at 11 (competition can make rate disparities between geographic regions worse); see also In the Matter of Access Charge Reform, First Report and Order, CC Docket 96-262, FCC 97-158 (May 16, 1997), para. 32 (noting harmful effects of competition on implicit subsidy system).

landline interstate interexchange services do.[10] "Discrimination" is also not possible because CMRS carriers are licensed and operate on a local basis, not in a nationwide market as do IXCs.

The oppositions discount the arguments raised by AirTouch, CTIA and others that CMRS competition provides sufficient market discipline to protect consumers in Alaska and Hawaii from unjust or unreasonable rates, citing the Commission's decision that competition in the landline interexchange market is insufficient to justify forbearance from rate integration.[11] This reference misses the point entirely. The essence of the rate integration concept is that prices in offshore areas would be "integrated" into a national schedule of charges for interstate, interexchange services.[12] But CMRS carriers compete locally; CMRS prices have never been set through a national tariff.

The Commission's consideration of competition and rate integration for nationwide interexchange services simply cannot be compared to CMRS because of this difference in the relevant geographic market. When conducting a analysis of competition in the market for those services, the Commission determined that relevant geographic market for interstate, interexchange calling is a single national market.[13] But when analyzing competitive conditions for CMRS services, the Commission and the industry have continuously looked at the local market as the relevant geographic market.[14] For example, Hawaii discusses "two cellular carriers per service area,"[15] even though at the time of initial licensing, there were more than two cellular carriers operating in the nation. Hawaii clearly understands that the CMRS market is local.

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[10]See, e.g., AirTouch Petition at 10.

[11]See, e.g., Opposition of Hawaii at 11; Opposition of Alaska at 12.

[12]See, e.g., Integration of Rates and Services, 61 F.C.C. 2d 380 (1976) ("We have under consideration proposals for the integration of Mainland/offshore rates and services into the domestic pattern")(emphasis added); Comments of Hawaii, CC Docket 96-61 (April 19, 1996), at 4-5 and citations therein.

[13]Notice of Proposed Rulemaking, CC Docket 96-61, 11 FCC Rcd 7141, para. 42. Notably, CMRS long-distance services were never discussed in this analysis of the interstate, interexchange services market.

[14]See generally Second Competition Report (March 25, 1997); see also Petition of Bell Atlantic at 13 ("decisions as to whether to have a separate charge for some types of interstate calls...are driven by local competitive factors ... [that] differ across the country").

[15]Opposition of Hawaii at 12 (emphasis added).

The Commission found that competition did not justify forbearance from rate integration for landline IXCs because competition in a nationwide market among nationwide landline IXCs creates incentives to deaverage rates and possibly discriminate against consumers in offshore areas.[16] Competition in the CMRS industry, within a local market, does not create the same incentives to raise prices in more costly parts of a service area.[17] Given fundamental differences in the relevant geographic market, the decisions cited in the oppositions are not relevant to CMRS.

Important differences between CMRS and landline IXC services drive the conclusion that cost differences also do not justify applying rate integration to CMRS. The costs of CMRS services, including CMRS long distance, do not include the disparate access charges assessed on landline IXCs, used to provide subsidies to Alaska and Hawaii.[18] To the extent that CMRS carriers offer customers the ability to place calls to points outside the local CMRS calling area, they generally do so through resold services of facilities-based IXCs. Since the underlying services are already rate integrated and rate averaged, these costs do not vary depending on whether the CMRS carrier operates in an offshore area. Thus, there is absolutely no incentive for CMRS carriers to charge higher rates in these areas. Rate integration for CMRS services serves no purpose except to limit the options available to customers.

Rate integration for CMRS is clearly unnecessary to preserve universal service. Telephone and Data Systems, which owns numerous rural LECs, states that rate integration is unnecessary to protect consumers.[19] BellSouth also supports reconsideration, although it also

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[16]"Policy and Rules Concerning the Interstate, Interexchange Marketplace," Report and Order, CC Docket No. 96-61, FCC 96-331 (August 7, 1996), para. 39.

[17]Moreover, because of the inherently mobile nature of CMRS, it is impossible to tell whether a customer within a local market area will be in the "high-cost" rural area of that market or not. For example, AirTouch customers in the rural areas of the Sacramento Valley market can obtain service on the same terms as those living in downtown Sacramento, because the "service" is not provided to a fixed point.

[18]This fact was explained at length in AirTouch's Petition. See, e.g., AirTouch Petition at 10. Thus, Hawaii cannot truthfully claim that the petitioners have presented "no meaningful discussion as to how forbearance [from rate integration] would protect consumers. Opposition of Hawaii at iii.

[19]Petition of Telephone and Data Systems, Inc. at 4-5. TDS is on record elsewhere as noting the unique nature of rural markets and the potential impact of competition on telecommunications service rates in those areas. See, e.g., Comments of TDS, CC Docket No. 96-45 (September 2, 1997), at 5. There is nothing inconsistent in TDS' position: CMRS services simply are not priced or structured in a manner that requires special measures to protect consumers in rural areas from increased CMRS competition.

provides service to rural areas and receives universal service support. If Alaska and Hawaii's thesis were true – that CMRS competition threatens universal service – it seems strikingly odd that neither the Commission, the Joint Board, nor Congress thought to even raise the issue, and that incumbent LECs serving rural areas would oppose applying rate integration to CMRS.[20]

II. Application of the Rate Integration Rule In the Manner Described by Alaska and Hawaii Is Anti-Competitive

Application of the rate integration rule would be anti-competitive in at least two specific ways, each of which was documented in the petitions: 1) application of the rate integration rule would jeopardize or eliminate the ability of CMRS carriers to offer wide-area calling plans; 2) application of the rule across affiliates would create an ever-expanding "daisy-chain" and simply eliminate price competition. The oppositions recognize the implications of rate integration in these areas, but the relief they propose is too limited to protect consumers. The Commission has already stayed the rate integration in these rules; it should simply make that stay into a broad permanent waiver. CMRS carriers, at a minimum, should not be required to integrate rates across affiliates; and they should be free to offer any market-specific price plan business judgment dictates.

A. Application of Rate Integration As Advocated By Alaska and Hawaii Would Still Eliminate Many Calling Plan Options For Consumers

In the October 3rd Stay Order, the Commission stayed, pending reconsideration, application of the rate integration requirements with respect to wide area rate plans offered by CMRS providers.[21] The oppositions appear to recognize that application of rate integration to CMRS threatens the viability of these consumer options, but they disagree on how this conflict should be reconciled. Neither party successfully explains which services must be rate integrated, or how this would be done without forcing CMRS services to mirror landline rating plans.

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[20]This seems even more odd if one accepts the contention that CMRS services are becoming real substitutes for landline interexchange services, see, e.g., Opposition of Hawaii at 10, since that would imply a bypass of the subsidy-producing service that could threaten universal service. Of course, if this contention were true, then it is also odd that the Commission's "Report on Long-Distance Market Shares," (released October 10, 1997) does not mention a single CMRS carrier.

[21]Stay Order, at para. 15.

Alaska agrees that interstate CMRS calls for which there is not a separate toll charge may not be subject to rate integration because they are not considered "interexchange calls." Apparently, Alaska agrees that CMRS providers should be able to continue to determine how to price their services in response to customer demands, to bundle airtime with resold long distance, and to offer rate plans that offer consumers more expansive local calling areas than available through landline services.

Hawaii, on the other hand, apparently would apply rate integration to any interstate call that crosses LEC exchange boundaries whether or not there is a separate discrete charge for toll service. For example, Hawaii argues that "it should not matter whether the interexchange charge is expressly labeled "interexchange" on a customer's bill, or is assessed indirectly through higher access fees or through higher per-minute airtime rates."[22] Hawaii's interpretation of rate integration would force CMRS carriers to define their service and prices in terms of the landline LEC's exchange boundaries. This result is clearly anti-competitive and anti-consumer.[23]

Both Alaska and Hawaii demonstrate the incongruity of applying rate integration to CMRS by equating the "interexchange" CMRS services subject to rate integration with the term "telephone toll service" in the Communications Act. As Alaska and Hawaii explain, that term is defined as "telephone service between stations in different exchange areas for which there is a made a separate charge not included in contracts with subscribers for exchange service."[24] But neither explains what the relevant "stations" or "exchange areas" are in the CMRS context. Alaska appears to simply ignore the issue and focus on the fact that CMRS carriers sometimes offer interstate services for which there is a separate toll charge.[25]

Hawaii apparently rejects the contention that a CMRS "exchange" could be based on a CMRS carriers' licensed service area, in part because those service areas are larger than the LEC

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[22]Opposition of Hawaii at 20.

[23]As the Commission has noted, CMRS customers are increasingly demanding larger geographic home markets – the area in which calls incur no separate or additional charge, i.e., a roaming or long-distance charge Second Competition Report, at 15.

[24]See, e.g., Opposition of Alaska at 2-3.

[25]Opposition of Alaska at 3.

study area boundaries. Hawaii argues that classifying as "local" all calls within an MTA would severely undercut the effectiveness of the rate integration requirement and its underlying universal service purpose."[26] Instead, Hawaii suggests that "CMRS calls could be classified in accordance with the classification of the underlying resold landline facility."[27]

Classifying calls in this manner inhibits the ability to offer wide-area calling plans and other options to consumers. A call considered by landline customer to be a toll call, but considered by a CMRS customer to be "local" within her home CMRS market, would now be subject to a separate integrated charge. If the rates for these calls are to be integrated, they must either be separated from the basic monthly access and airtime charges.[28] This also imposes technical and administrative burdens on CMRS carriers, creating additional costs for consumers. It is also contrary to the regulatory approach Congress intended for CMRS carriers. As PrimeCo notes, Congress has explicitly recognized that CMRS services do not reference LEC exchange boundaries in pricing their services or constructing their networks.[29]

B. *Alaska and Hawaii Agree That Relief From The Anti-Competitive Effects of Applying Rate Integration Across Affiliates Is Appropriate*

Alaska maintains that rate integration should apply to all entities that are controlled by a single and common parent entity.[30] Hawaii allows that "affiliation" should not apply to multiple competing parent companies that jointly control a CMRS provider or commonly owned providers competing in the same geographic service area.[31] These exceptions would apparently address the PrimeCo scenario: AirTouch, U S WEST and Bell Atlantic jointly control PrimeCo, but as "multiple competing parent companies" would not be required to integrate rates with PrimeCo, nor

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[26]Opposition of Hawaii at 23. Again, it is difficult to discern what harmful effect on universal service could come to pass if CMRS calls are classified as "interexchange" less often than landline calls are so classified. CMRS interexchange calls do not subsidize any of the costs of universal service

[27]Opposition of Hawaii at 22.

[28]The only other alternative would be for a CMRS carrier must integrate the entirety of its service rates, a step the Commission has already rejected. Reconsideration Order, para. 18.

[29]Petition of PrimeCo Personal Communications at 12; Petition of Bell Atlantic at 11.

[30]Opposition of Alaska at 15.

[31]Opposition of Hawaii at 24.

with each other under this approach. Similarly, AirTouch's wholly-owned San Diego market would not have to charge the same rates as a non-wholly owned partnership in Kansas in which AirTouch participates, since more than one company is involved in control of the two entities.

These limited exceptions are unnecessarily difficult to administer and limit the ability of carriers to respond competitively to local market conditions. As noted earlier, the essence of the rate integration principle is to "integrate" rates for offshore points into the "uniform mileage rate pattern applicable to the mainland."[32] Thus, the Reconsideration Order observed that separate subsidiaries, each serving a separate geographic area, could undermine the rate integration policy.[33] But the Commission has licensed CMRS carriers on the basis of separate geographic areas, expects CMRS carriers to compete on that basis, and has never established a "uniform mileage rate pattern" or any other nationwide price plan for CMRS. The Commission has taken these steps because rate integration is so fundamentally unnecessary to protect consumers. And it would be anti-competitive to require these subsidiaries to now establish uniform prices. Accordingly, the Commission should simply grant a permanent waiver of the affiliation rule as applied to CMRS.

CONCLUSION

It is apparent from the record so far that parties are becoming mired in legalistic analysis and losing sight of the practical benefits (or lack thereof) of applying the rule. Congress intended the 1996 amendments to institute a "de-regulatory" approach. Rather than attempting to shoehorn CMRS services into a rule intended only for landline services and that system of implicit universal service subsidies,[34] the Commission should simply ask and answer the question of whether applying rate integration to CMRS carriers is necessary.

As nearly everyone has assumed for the existence of the rate integration policy, rate integration for CMRS carriers is simply not necessary to protect consumers. Although Alaska and Hawaii apparently believe otherwise, they provide no support for this position, either in the form of

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[32]See 61 F.C.C. 2d at 383.

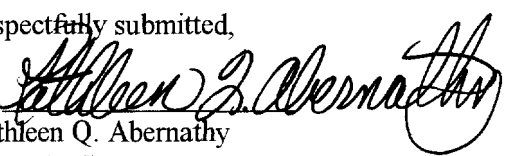
[33]Reconsideration Order, para. 15.

[34]See Petition of BellSouth at 5, citing 141 Cong. Rec. S7885, S7886 (June 7, 1995)(statement of Sen. Pressler)("we can no longer keep trying to fit everything into the old traditional regulatory boxes—unless we want to incur unacceptable economic costs, competitiveness losses, and deny American consumers access to the latest products and services").

actual price data or economic analysis. Second, it is "abundantly clear" to everyone that CMRS services, including their long distance offerings and roaming services, have absolutely nothing to do with implicit support for universal service. CMRS carriers rates are regulated by the market, and CMRS carriers contribute to explicit federal mechanisms for subsidizing universal service. CMRS competition presents no threat of diminished service, increased rates. discrimination or other harms to consumers in offshore or rural areas.

Just as the Commission carefully adopted a stay of the rate integration rule applicable to CMRS carriers only, it can fashion an Order addressing CMRS rate integration only. There is no reason that this decision would, or could, serve as precedent for any other decisions regarding rate integration. It should serve as precedent to establish that this Commission will implement the "de-regulatory" intent of the 1996 amendments to the Communications Act by regulating only where facts and economics demonstrate that it is necessary to do so to protect consumers.

Respectfully submitted,

By: 

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November 10, 1997

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I, Jo-Ann G. Monroe, hereby certify that on this 10th day of November 1997, copies of the foregoing Reply in CC Docket No. 96-61 were served on the following by hand to:

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